

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

:

INDICTMENT

:

- v. -

:

22 Cr.

JAMES ELLIS

:

:

:

:

Defendant.

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:

:

- - - - - X

X

22 CRIM 022

COUNT ONE

(Felon in Possession of a Firearm)

The Grand Jury charges:

1. On or about December 7, 2021, in the Southern District of New York and elsewhere, JAMES ELLIS, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess a firearm, to wit, a Taurus model PT 100 .40 caliber handgun, and the firearm was in and affecting commerce.

(Title 18, United States Code, Sections 922(g)(1),
924(a)(2), and 2.)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Indictment, JAMES ELLIS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28 United States Code,

Section 2461(c), any and all firearms and ammunition involved in or used in said offense, including but not limited to one a Taurus model PT 100 .40 caliber handgun recovered during the arrest of ELLIS on or about December 7, 2021.

Substitute Assets Provision


3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 924;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


DAMAIN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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Defendant.

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(18 U.S.C. §§ 922(g)(1),
924(a)(2), and 2.)

DAMIAN WILLIAMS
United States Attorney


Foreperson
